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December 31, 2015

VIA ECF AND EMAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: *Irving H. Picard, Trustee v. Helen Saren-Lawrence* Adv. Pro. No. 10-04898 (SMB)

Dear Judge Bernstein:

I write to briefly respond to the letter from the Trustee's counsel concerning the Trustee's subpoena of the bank records of Helene Saren-Lawrence. I was in court on December 16, 2015 when Your Honor stated, in connection with the *Wiener* case where the same issue arose, that the Trustee is **not** entitled to take discovery concerning subsequent transfers. Yet this is precisely what the Trustee is seeking to do here. We have agreed that the Trustee is entitled to see the bank records showing transfers to and from Madoff but surely the Trustee is not entitled to see the other personal financial information on the bank records. We are amenable to any methodology which protects the defendant's privacy and assures that the Trustee will obtain the discovery to which he is entitled. Allowing the Trustee to see the unredacted bank records does not accomplish that goal and constitutes an unwarranted invasion of the defendant's privacy.

Respectfully,

/s/ *Helen Davis Chaitman*

Helen Davis Chaitman

HDC:leb

cc: *Via ECF and Email*
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